

# **Exhibit 7**

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**From:** Bak, Sander  
**Sent:** Friday, November 30, 2007 4:18 PM  
**To:** 'IRA B. MATETSKY'  
**Cc:** 'William A. Jaskola'; 'Sari Kolatch'; 'swagner@ctswlaw.com'; 'egoldstein@paulweiss.com'; 'Peggy S Chen'; 'syr@mr-law.net'; 'millersj@gtlaw.com'; 'jhurwitz@paulweiss.com'; 'robert.carangelo@weil.com'; 'stacy.nettleton@weil.com'; Elman, Deborah; Korot, Mia  
**Subject:** RE: Wilson v. ImageSat

Ira,

By next week we'll know whether we've located any additional documents from ISI and its D&Os that are responsive and relevant to the jurisdictional discovery. As I've told you, you already have the bulk of our production on jurisdictional issues. In light of that, and the fact that plaintiffs' opposition brief is due in two weeks, I would ask you to let us know right away if there are depositions you want to take on jurisdictional issues and that we schedule them now. For the past month you've informed defendants several times that you'll be seeking jurisdictional depositions but you have not sent a single notice. (See, e.g., emails we exchanged on this same topic on November 4). My clients are willing to consent to a short extension of the briefing schedule but we don't want it to stretch out indefinitely and at this point it's beginning to appear that this is plaintiffs' goal.

Regards,

Sander

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**From:** IRA B. MATETSKY [mailto:IMatetsky@ganshore.com]  
**Sent:** Friday, November 30, 2007 10:28 AM  
**To:** Korot, Mia; William A. Jaskola; Sari Kolatch; swagner@ctswlaw.com; egoldstein@paulweiss.com; Peggy S Chen; syr@mr-law.net; millersj@gtlaw.com; jhurwitz@paulweiss.com; robert.carangelo@weil.com; stacy.nettleton@weil.com; Bak, Sander; Elman, Deborah  
**Subject:** RE: Wilson v. ImageSat

Mia:

Thank you for your letter and the information contained in it.

Please advise when you will be furnishing additional responses and/or documents on behalf of ImageSat and its D&O's, or alternatively advising that nothing further will be furnished. I also ask Elbit's counsel to advise when they will be producing the additional documents referenced in Elbit's responses to our document request. Once we have this information and documents, I will be in a position to determine whether Plaintiffs will be taking any document disputes to the Magistrate Judge, what depositions Plaintiffs will notice on jurisdictional issues, and how much additional time Plaintiffs will need before responding to the motions to dismiss in order to accommodate the foregoing.

I am sorry for the delay in accommodating ImageSat's and Elbit's requests for copies of the documents listed in Exhibit F. These will be produced on Monday.

Best regards,  
IBM

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**From:** Korot, Mia [mailto:MKorot@milbank.com]

**Sent:** Wednesday, November 28, 2007 7:12 PM

**To:** IRA B. MATETSKY; William A. Jaskola; Sari Kolatch; swagner@ctswlaw.com; egoldstein@paulweiss.com; Peggy S Chen; syr@mr-law.net; millersj@gtlaw.com; jhurwitz@paulweiss.com; robert.carangelo@weil.com; stacy.nettleton@weil.com; Bak, Sander; Elman, Deborah

**Subject:** Wilson v. ImageSat

Please see the attached.

Mia C. Korot

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